

Appendix D

Response to Data Request

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Energy Environmental Review and Analysis

Questions for Development of Environmental Review

In the Matter of the Application for a Site Permit for the Proposed 130 MW Plummer Solar Project

PUC Docket No.	IP-7103/GS-22-451	Directed To:	Heather Riome
EERA Question No.	1	Please Respond By:	August 20, 2024

Note: Energy Environmental Review and Analysis staff intends to use information provided in this response to develop an environmental review document and is a public document. Responses to these questions will be considered public information unless otherwise designated by the respondent as nonpublic information pursuant to Minnesota Stat. § 13.02.

Question(s): Project Cost

The Applicant has designated that the project cost estimate provided in Appendix F of the application as nonpublic data in accordance with Minnesota Rules, part 7829.0500 and Minn. Sta. Ch. 13. The Applicant contends that release of Project cost information “would have a detrimental effect on the Applicant by providing potential competitors and others in the energy marketplace with valuable information not otherwise readily ascertainable and from which these persons would obtain economic value.”

The Department has not evaluated this claim; however, high-level cost estimates are provided by other applicants for site permits. Please provide a summary of the Project’s capital cost similar to those provided by applicants for other recent site permits for solar facilities (e.g., [Louise Solar Project - Site Permit Application](#), Table 4; Table 2.5.2, Elk Creek Solar Amended Application; [Timberwolf Solar Project Site Permit Application](#), Table 2.5.1; [Lake Wilson Solar Energy Center Site Permit Application](#), Table 5; [Byron Solar Project Joint Site and Route Permit Application](#), Table 4).

Typical cost categories used in the above-cited examples include engineering, procurement, and construction; development; interconnection; financing; and transmission.

Jessica Livingston

August 6, 2024

Environmental Review Manager

Date

MN Department of Commerce

Livingston, Jessica (She/Her/Hers) (COMM)

From: Heather Riome <heather.riome@enbridge.com>
Sent: Thursday, September 5, 2024 2:52 PM
To: Livingston, Jessica (She/Her/Hers) (COMM)
Cc: Jason Risdall; Brusven, Christina
Subject: RE: Plummer Solar Data Request 1

Hi Jessica,

Thanks for the discussion today. As I noted, if we provide a narrower range or consistent ranges on each of the line items, we wouldn't be accurately capturing all of the uncertainties in front of the Plummer Solar project.

Engineering, Procurement and Construction Cost: Frost heave conditions will impact construction and foundation costs so we built in a wider range to accommodate those uncertainties but will have to see how contractors deal with that in their estimates. Market conditions are changing, component costs continue to fluctuate, and we aren't close enough to purchasing materials to get a tight estimate.

Interconnection Costs: We submitted the interconnection application in September 2022, but won't have the first iteration of interconnection cost back until February 2025, earliest, at completion of Phase I studies. The MISO has delayed their target date for completion (10 times so far). Phase II and Phase III of the MISO studies will also cause variation in the interconnection costs, potentially wildly so (historically the MISO withdrawal rate for applications is 80% and this ripples through the results for all remaining active applicants).

I hope this additional context is helpful.

Heather

From: Livingston, Jessica (She/Her/Hers) (COMM) <jessica.livingston@state.mn.us>
Sent: Thursday, August 22, 2024 12:49 PM
To: Heather Riome <heather.riome@enbridge.com>
Cc: Jason Risdall <Jason.Risdall@enbridge.com>; Brusven, Christina <cbrusven@fredlaw.com>
Subject: [External] RE: Plummer Solar Data Request 1

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Good afternoon Heather,

Energy Environmental Review and Analysis

Questions for Development of Environmental Review

In the Matter of the Application for a Site Permit for the Proposed 130 MW Plummer Solar Project

PUC Docket No.	IP-7103/GS-22-451	Directed To:	Heather Riome
EERA Question No.	2	Please Respond By:	October 27th, 2024

Note: Energy Environmental Review and Analysis staff intends to use information provided in this response to develop an environmental review document and is a public document. Responses to these questions will be considered public information unless otherwise designated by the respondent as nonpublic information pursuant to Minnesota Stat. § 13.02.

Question(s): Project fence

The Applicant has designated that the project will use perimeter fencing 8 ft-high chain link fence topped with 3 strands high-tensile wire, as referenced in section 5.2.6 and 5.5.7 of the Site Permit Application.

However, in section 4.1.5 of the Site Permit Application, it is mentioned that an 8-ft high chain-linked fence with 3 strand barbed wire on top will be used. It is also cited that Plummer Solar considered the Commercial Solar Siting Guidance document published by the MNDNR when designing the project, and that resources discussed in the guidance have been avoided and reasonable fencing setbacks from road rights-of-way have been applied to provide space for animals to travel. The DNR's Commercial Solar Siting Guidance prohibits the use of barbed-wire on fencing (see below).

"Fences pose a risk of entanglement, injuries, or death for birds and other animals. To avoid or reduce injuries and fatalities, barbed wire should never be used at the top of the fence. To increase perceptibility, the DNR may recommend high visibility markers to avoid bird or other wildlife engagement. Wildlife entanglement, injuries, or fatalities result in poor public relations for the solar operator." ([DNR, 2023](#))

Please provide additional information about fence design for the project perimeter, including clarification on the usage of barbed wire, or tensile wire for the top of the fence.

Jessica Livingston

October 25, 2024

Environmental Review Manager

Date

MN Department of Commerce

Livingston, Jessica (She/Her/Hers) (COMM)

From: Heather Riome <heather.riome@enbridge.com>
Sent: Friday, October 25, 2024 5:58 PM
To: Livingston, Jessica (She/Her/Hers) (COMM); Jason Risdall
Cc: Brusven, Christina
Subject: RE: Plummer-DR-2_10-25-24

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Good afternoon Jessica,

Regarding the project perimeter fencing, the project intends to incorporate an 8 ft-high chain link fence topped with 3 strands high-tensile wire. We incorporated this language in 5.2.6 and 5.5.7 of our application, but there's an error in section 4.1.5 where barbed wire was mentioned. No barbed wire will be used on the project perimeter fence.

Heather

From: Livingston, Jessica (She/Her/Hers) (COMM) <jessica.livingston@state.mn.us>
Sent: Friday, October 25, 2024 2:46 PM
To: Heather Riome <heather.riome@enbridge.com>; Jason Risdall <Jason.Risdall@enbridge.com>
Cc: Brusven, Christina <cbrusven@fredlaw.com>
Subject: [External] Plummer-DR-2_10-25-24

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Good afternoon Heather,

I am reaching out to request additional project data for the development of the Plummer Solar project EA. See the attached Data Request for the Plummer Solar project, regarding fencing design.

The Department is seeking additional information on the usage of barbed wire on top of the perimeter fence, due to inconsistency with the MNDNR Solar Siting Guidance. Please provide a response to the request no later than the end of the day on Sunday, October 27th 2024.

Please let me know if you have any questions,

Thank you!

Jessica

Jessica Livingston

Energy Environmental Review and Analysis

651-539-1823

mn.gov/commerce/energyfacilities

Minnesota Department of Commerce

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